

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

REBECCA RIOS,

*Plaintiff,*

v.

Civil Action No. 1:24-CV-01399-CCC

CHAD E. MARTIN, in his official capacity as  
Chief of the Hanover Borough Police  
Department and HANOVER BOROUGH,  
PENNSYLVANIA,

*Defendants.*

**UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME TO FILE RESPONSE**  
**TO MOTION TO DISMISS**

Plaintiff Rebecca Rios, by and through undersigned counsel, hereby files the within Unopposed Second Motion for Extension of Time to File Response to Motion to Dismiss, averring as follows:

1. Plaintiff initiated this action on August 19, 2024. *See* ECF No. 1.
2. Plaintiff properly and timely served Defendants on August 21, 2024. *See* ECF No. 6.
3. On September 5, this Court granted Defendants' Motion to Extend Deadline to Respond to Complaint, extending Defendants' deadline to respond until October 21, 2024. *See* ECF No. 8.
4. On October 21, 2024, Defendants filed a Motion to Dismiss Plaintiff's Complaint, raising numerous arguments in support of their Motion. *See* ECF Nos. 10–11.
5. On October 25, 2024, Plaintiff filed an Unopposed Motion for Extension of Time to File Response to Motion to Dismiss due to the undersigned counsel's, Alexa L. Gervasi, immediately impending change of firms. *See* ECF No. 12.

6. On October 28, 2024, this Court granted Plaintiff's motion, extending Plaintiff's deadline to respond until November 18, 2024.

7. On November 6, 2024, Mrs. Gervasi's maternal grandmother fell ill and was admitted to the hospital, requiring Mrs. Gervasi to travel to her family.

8. Ms. Gervasi is still tending to this dire family matter.

9. Due to this situation, Mrs. Gervasi requires additional time to respond to Defendants' Motion to Dismiss.

10. Plaintiff, therefore, requests that this Court provide Plaintiff with an additional 14 days, until December 2, 2024, to respond to Defendants' Motion to Dismiss.

11. Counsel for all parties conferred via email, and Defendant's do not oppose this request for extension.

WHEREFORE, Plaintiff respectfully requests that this Court grant this Unopposed Second Motion for Extension of Time to File Response to Motion to Dismiss and permit Plaintiff to file their response to Defendants' Motion to Dismiss on or before December 2, 2024.

Dated: November 14, 2024

Respectfully submitted,

/s/ Alexa L. Gervasi

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